

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. STEPHEN R. GOLDENBERG, Defendant.	Adv. Pro. No. 10-04946 (SMB)

STIPULATION REGARDING EXTENSION OF TIME FOR FILING RULE 9033(b)
OBJECTIONS TO THE COURT’S REPORT AND RECOMMENDATION

Plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. §§ 78aaa-III, and the estate of Bernard L. Madoff, and Defendant Stephen L. Goldenberg (“Defendant”) (together with the Trustee, the “Parties”), have conferred by and through their counsel and, subject to the Court’s approval, hereby stipulate as follows:

WHEREAS, on October 2, 2017, the Trustee filed a Motion for Summary Judgment in the above-captioned adversary proceeding;

WHEREAS, the Trustee's Motion for Summary Judgment was fully briefed by the Parties;

WHEREAS, on June 20, 2018, the Court issued a Report and Recommendation to the District Court to Grant the Plaintiff's Motion for Summary Judgment and Enter Money Judgment in Favor of the Plaintiff ("Report and Recommendation") in the above-captioned adversary proceeding;

WHEREAS, on July 2, 2018, the Court issued a Memorandum Endorsed Order extending the due date for the filing of any objections to the Court's Report and Recommendation by Defendant under Bankruptcy Rule 9033(b) until July 20, 2018, and extending the due date for the filing of any responses to such objections by the Trustee until August 17, 2018;

WHEREAS, the Parties have reached an agreement, subject to documentation, to resolve the Trustee's claims against Defendant; and

WHEREAS, the Parties intend to draft and execute a written settlement agreement memorializing the terms of the Parties' agreement to resolve this adversary proceeding;

IT IS HEREBY STIPULATED AND AGREED by and between counsel for the undersigned Parties, as follows:

1. The due date for the filing of objections under Bankruptcy Rule 9033(b) by Defendant to the Court's Report and Recommendation is extended by twenty-eight (28) days, until August 17, 2018; and

2. The due date for the filing of responses by the Trustee to any objections to the Court's Report and Recommendation is extended by twenty-eight (28) days, until September 14, 2018.

Dated: July 17, 2018
New York, NY

By: /s/ Keith R. Murphy
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SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate of
Bernard L. Madoff*

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PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING THEREFORE, IT IS SO
ORDERED.

DATED: July 17, 2018

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY COURT JUDGE